

# Calcaterra Law P.C.

January 2, 2024

**VIA NYSCEF**

Hon. Andrew T. Baxter  
Chief U.S. Magistrate Judge  
U.S. District Court for the Northern District of New York

RE: *Doe v. Syracuse University et al.*, 5:21-cv-00977-GLS-ATB  
Plaintiff's Request to Reset Initial Rule 16 Conference

Dear Chief Magistrate Judge Baxter:

This firm represents Plaintiff Jane Doe in the above-referenced matter. I write to respectfully request that the Court grant a seven (7) day adjournment of the telephonic Rule 16(b) Conference, as well as the related Rule 26 conference and initial disclosure deadlines and deadline to submit a civil case management plan. The Rule 16(b) Conference is currently scheduled for January 24, 2024, at 11:30 AM before your successor. ECF 42. Plaintiff requests that the Rule 16(b) Conference be reset to January 31, 2024, or some date afterward that would be convenient for the Court.

The reason for my request is that additional time is required to prepare Plaintiff's initial disclosures and that I will have uncertain availability to attend the Rule 16(b) Conference as I must handle an out of state expert deposition set for January 23 and 25, 2024, that was scheduled after this Rule 16(b) Conference had been set.

I have conferred with Defense Counsel via email regarding the above and have been authorized to represent that this adjournment request is unopposed by Syracuse University. The parties can be available for the Rule 16(b) conference at any time on Wednesday, January 31, 2024. Thank you for your consideration.

Respectfully submitted,

/s/ James Aliaga

cc: Counsel of Record (via ECF)